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**BELLSOUTH**

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Vice President-Federal Regulatory

March 12, 1999

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EX PARTE

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> S.W., Room TWB-204  
Washington, D.C. 20554

RECEIVED  
MAR 12 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: CC Docket No. 98-147

Dear Ms. Salas:

On March 11, 1999, Steve Klimacek, Bill McNamara, Pam Tipton and I met with the Commission staff to discuss issues arising in the Commission's advanced technologies docket. The staff with whom we met included: Kevin Martin, Legal Advisor to Commissioner Furchtgott-Roth; Linda Kinney, Legal Advisor to Commissioner Ness; Paul Gallant, Legal Advisor to Commissioner Gloria Tristani; and Larry Strickling, Chief of the Common Carrier Bureau. The following Common Carrier Bureau staff persons also attended some or all of the meeting with Mr. Strickling: Robert Attkinson; Donald Stockdale; Jane Jackson; Carol Matthey; and Michael Pryor.

Our discussions focused upon issues raised in Docket 98-147 relating to physical collocation in BellSouth central offices and remote locations and to imposing Section 251(c)(4) resale obligations on xDSL offerings that an ILEC makes on only a wholesale basis. The attached documents formed the basis for the BellSouth presentation.

In compliance with the Commission's rules, I am filing two copies of this notice and ask that you associate this notification with the proceeding identified above.

Sincerely,

*Kathleen B. Levitz*

Kathleen B. Levitz  
Vice President - Federal Regulatory  
Attachments

No. of Copies rec'd at 2  
List A B C D E

cc:	Linda Kinney	Paul Gallant	Kevin Martin
	Larry Strickling	Robert Attkinson	Donald Stockdale
	Jane Jackson	Carol Matthey	Michael Pryor

# CC Docket 98-147 Ex Parte

BellSouth Telecommunications, Inc.

March 11, 1999

# Central Office Collocation

## ◆ What BellSouth is doing:

- ✓ Common area collocation, including cageless collocation
- ✓ Real time information on space availability on per request basis
- ✓ Web-based report on space exhaust, updated within 1 week of filed petition
- ✓ Collocation of DSLAM equipment in virtual and physical collocation
- ✓ Collocation of switching equipment in physical collocation

## ◆ State Commissions have diligently addressed collocation standards

- ✓ Florida has established interval guidelines, is actively examining space exhaust/exemption process
- ✓ Georgia is examining current issues and comprehensive terms and conditions in upcoming workshop
- ✓ Louisiana has workshops in progress addressing intervals and performance measurements
- ✓ Kentucky and North Carolina have ordered collocation options

## ◆ The Commission should not preempt the work of state commissions

# Central Office Collocation

## Equipment

- ◆ **The Commission should exercise caution in removal of equipment restrictions**
  - ✓ There should be no unilateral requirement to allow switching equipment, particularly in virtual collocation, due to maintenance/servicing concerns, space allocation and grounding issues.
  - ✓ Limitation to “equipment necessary for interconnection or access to UNEs”, which necessarily allows xDSL electronics, such as DSLAMs, are reasonable.
  - ✓ The Commission should decline to require collocation of equipment used to provide enhanced services.

## Space Allocation

- ◆ **Cumbersome reporting requirements will not accomplish the Commission’s goal of efficient use of space or providing information useful to CLECs.**
  - ✓ Timely reporting of space exhaust via the web or upon request will meet this goal
  - ✓ In order for a report of space availability to be meaningful to CLECs, it must address the availability of space and infrastructure for a particular CLEC’s configuration.
- ◆ **BellSouth supports upholding the Commission’s existing rules on space warehousing.**

# Central Office Collocation

## Intervals

### ◆ **The Commission should not establish presumptive intervals**

- ✓ Such intervals would be arbitrary and could not take into account regional/state-specific anomalies such as rigorous permitting requirements.
- ✓ National standards step over state-established guidelines and procedures.
- ✓ State commissions are in a better position to determine on a case by case basis whether BellSouth is delaying collocation.
- ✓ Establishing interval national guidelines instead of focusing on performance management and measurement is an illusory approach to meeting the Commission's goals.

# Remote Terminal Collocation

- ◆ **Because this issue is tied to sub-loop unbundling, the Commission should defer resolution until the “necessary and impair” issues are resolved**
- ◆ **Collocation in remote terminals should be required only on a case-by-case basis where technically feasible because of**
  - ✓ **limited space in remote terminals**
  - ✓ **severe power and heat dissipation in cabinets**
  - ✓ **security concern**
- ◆ **BellSouth has successfully negotiated agreements using a cross-box to cross-box interconnection arrangement**

# Resale Requirements

- ◆ **Section 251(c)(4) resale obligations only apply if the service is offered at retail**
- ◆ **BellSouth's ADSL service is clearly not a retail service**















